

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,

Plaintiff,

vs.

CRIMINAL NO.: 03-CR-10331 (RGS)

IVAN VELEZ,

Defendant.

**EMERGENCY MOTION TO EXTEND
SELF- SURRENDER DATE**

COMES NOW the Defendant, Ivan Velez, by and through his undersigned counsel, and moves this Honorable Court to extend the self-surrender date in this cause to a period of four weeks and in support thereof alleges as follows:

1. This Honorable Court sentenced the defendant, Ivan Velez, to thirty months prison, and allowed defendant to remain at freedom until his self surrender date of October 24, 2006.
2. However, the defendant, as well as the undersigned, has contacted the United States Marshall's Office, Ron Bivan at (617) 748-2500 and has been advised that the Bureau of Prisons has not designated the defendant to a specific institution to surrender himself to.
3. The defendant wishes, as the Court previously ordered, to self- surrender to the federal institution to which he will be designated, and not to the United States Marshall's Office in Boston, Massachusetts. Specifically, the defendant wishes to self- surrender to a camp facility near his home in Miami, as the court has previously ordered.
4. The defendant wishes not to lose the credits granted in the Bureau of Prisons system by

By Order of the Court,
Mary H. Lyons, Deputy Clerk

*10-24-06
Starns,
DS - Motion Allowed."*

benefit of a self-surrender due to a back log in the designations section.

5. Assistant United States Attorney Suzanne Sullivan has taken the foregoing under advisement, but is yet to state her position on the same.

WHEREFORE, the Defendant, Ivan Velez, prays that the Court grant his motion and extend his self-surrender date by a period of four weeks to allow the Bureau of Prisons additional time to designate the defendant to a facility.

Respectfully submitted,

PERCY MARTINEZ, P. A.
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By P. Martinez
Percy Martinez, Esq.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was faxed to Suzanne Sullivan, Esq. at the United States Attorneys Office, Boston Massachusetts, on this 23rd day of October 2006.

By P. Martinez
Percy Martinez, Esq.